

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC.,
20 COMMONWEALTH LAND TITLE INSURANCE
21 COMPANY, FIDELITY NATIONAL TITLE INSURANCE
22 COMPANY, CHICAGO TITLE OF NEVADA, INC., and
23 FIDELITY NATIONAL TITLE AGENCY OF NEVADA, INC.

24 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
25 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

26 Gary L. Compton, State Bar No. 1652
27 2950 E. Flamingo Road, Suite L
28 Las Vegas, Nevada 89121

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00348-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT, REMAND MOTION,
AND FEES MOTION (ECF NOS. 1, 7,
AND 8)**

FIRST REQUEST

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG"), Commonwealth
Land Title Insurance Company ("CLTIC"), Fidelity National Title Insurance Company
("FNTIC"), Chicago Title of Nevada, Inc. ("Chicago Agency"), and Fidelity National Title

1 Agency of Nevada, Inc. (“Fidelity Agency”) (collectively, “Defendants”), and plaintiff Bank of
2 America, N.A. (“Bank of America”) (collectively with Defendants, the “Parties”), by and through
3 their respective attorneys of record, which hereby agree and stipulate as follows:

4 1. On March 1, 2021 Bank of America filed its complaint in the Eighth Judicial
5 District Court for the State of Nevada;

6 2. On March 1, 2021, CLTIC and FNTIC removed the instant case to the United
7 States District Court for the State of Nevada (ECF No. 1);

8 3. Chicago Agency’s and Fidelity Agency’s responses to Bank of America’s
9 complaint are currently due on April 13, 2021;

10 4. CLTIC’s and FNTIC responses to Bank of America’s complaint are currently due
11 on April 15, 2021;

12 5. Bank of America filed a motion to remand and a motion for fees (ECF Nos. 7 and
13 8);

14 6. Defendants’ deadline to respond to the motion to remand and the motion for fees is
15 currently April 13, 2021;

16 7. The Parties are in the process of formalizing a stipulation to stay this case pending
17 the appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case No. 19-
18 17332 (District Court Case No. 3:19-cv-00241-MMD-WGC);

19 8. Defendants request a two-week extension of these deadlines to afford the Parties
20 additional time to formalize their stipulation to stay this case;

21 9. Counsel for Bank of America does not oppose the requested extension;

22 10. This is the first request for an extension made by Defendants, which is made in
23 good faith and not for the purposes of delay.

24 11. This stipulation is entered into without waiving any of Defendants’ objections
25 under Fed. R. Civ. P. 12.

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Chicago Agency's and Fidelity Agency's deadline to
2 respond to the complaint is hereby extended through and including Monday, April 27, 2021,
3 CLTIC's and FNTIC's deadline to respond to the complaint is hereby extended through and
4 including Monday, April 29, 2021, and Defendants' deadline to respond to the motion to remand
5 and the motion for fees (ECF Nos. 7 and 8) is hereby extended through and including
6 Wednesday, April 28, 2021.

7 Dated: April 13, 2021

SINCLAIR BRAUN LLP

8
9 By: /s/-Kevin S. Sinclair
10 KEVIN S. SINCLAIR
11 Attorneys for Defendants
12 FIDELITY NATIONAL TITLE GROUP,
13 INC., COMMONWEALTH LAND TITLE
14 INSURANCE COMPANY, FIDELITY
15 NATIONAL TITLE INSURANCE
16 COMPANY, CHICAGO TITLE OF
17 NEVADA, INC., and FIDELITY NATIONAL
18 TITLE AGENCY OF NEVADA, INC.

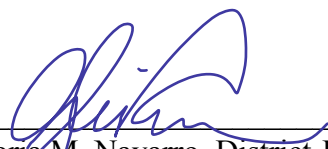
19 Dated: April 13, 2021

WRIGHT FINLAY & ZAK, LLP

20
21 By: /s/-Darren T. Brenner
22 DARREN T. BRENNER
23 Attorneys for Plaintiff
24 BANK OF AMERICA, N.A.

25
26 **IT IS SO ORDERED.**

27 Dated this 13 day of April, 2021

28

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT